

**CITIZENS' COMMISSION ON
JAIL VIOLENCE**

**TENTH REPORT
OF THE IMPLEMENTATION MONITOR**

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OF THE IMPLEMENTATION MONITOR
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I am pleased to submit to the Board of Supervisors my Tenth Report regarding the implementation of the recommendations set forth in the September 28, 2012 Report of the Citizens' Commission on Jail Violence (the "Commission").

BACKGROUND

Since submitting my Ninth Report to the Board of Supervisors on September 10, 2013, I have continued to monitor the efforts by the Los Angeles Sheriff's Department (the "Department") to implement the Commission's recommendations. During this most recent period, I met with the Sheriff and senior management in Custody Operations to confirm the Department's continued adherence to the Commission's recommendations pertaining to oversight and management of Custody Operations. I also reviewed the Department's use of force statistics with senior management in Custody Operations, reviewed the Department's funding requests with the Chief Executive's Office, and attended a Public Safety Cluster meeting to discuss the Department's funding requests. I also met with the Department to review an upgrade to the Personnel Performance Index (PPI) that enables the Department to track inmates grievances by the names of Department personnel in PPI.

As reflected in the summary chart set forth below, as of the date of this Report, the Department has implemented 43 of the Commission's 60 recommendations directed

to the Department.¹ It has partially implemented another 12 recommendations and is in the process of implementing another 5 recommendations.

Category	Implemented²	Partially Implemented³	In progress⁴	Total	Funding Approved⁵
Use of Force	10	0	2	12	2
Management	12	0	2	14	1
Culture	5	3	0	8	3
Personnel/ Training	5	5	0	10	3
Discipline	10	4	1	15	5
Oversight	1	0	0	1	0
Total	43	12	5	60	14

During this period, the Department implemented four more of the Commission's recommendations, two of which were the same recommendation by different investigative teams. The Department has now assigned Compliance Lieutenants to each of the facilities (with one for the North and South facilities). The duties of these

¹ A more detailed breakdown of the status of the Department's implementation of each recommendation is attached as Appendix 1 to this Report. A comparison reflecting the progress of the Department's implementation of the recommendations is set forth in Appendix 2.

² "Implemented" means that the Department's implementation of the recommendation has been reviewed and approved by the Monitor, and the reforms have been incorporated into jail operations.

³ "Partially Implemented" means that the Department has implemented the recommendation, but some additional steps are required to complete the implementation.

⁴ "In progress" means that the Department is assessing the policy, procedural and operation needs and/or is in the process of implementing the recommendation.

⁵ "Funding Approved" refers to the approval of the Board of Supervisors on October 8, 2013, of the Department's funding request to implement additional Commission recommendations.

Compliance Lieutenants include analyzing inmate grievances about force incidents (Recommendation 3.10), tracking and monitoring force investigations at the unit level (Recommendation 7.8), and conducting Administrative Investigations of Category 1 force incidents (Recommendation 7.9 (in part).) The Department has also upgraded PPI so that inmate grievances can now be tracked by the names of Deputy Sheriffs and Custody Assistants in PPI, which implements two of the recommendations (3.8 and 7.13).

On October 8, 2013, the Board approved the Department's requests for funding to implement fully 14 of the remaining 17 recommendations that are either partially implemented or in progress.⁶ Specifically, the Board approved funding for an upgraded computer system (Recommendation 3.8); six Compliance Lieutenants (Recommendations 3.10, 7.8, and 7.9 (in part)); 32 positions for a new Custody Training and Standards Bureau to be phased in over a three-year period (Recommendations 5.2, 5.3, 5.8 and 6.3); 91 additional supervisors to be phased in over a two-year period (Recommendation 6.5); seven new positions in the Internal Investigations Division (Recommendation 7.5); 28 additional Internal Affairs Bureau (IAB) investigators and 40 additional Internal Criminal Investigations Bureau (ICIB) investigators to be phased in over a three-year period (Recommendations 7.1 (in part), 7.6, and 7.9 (in part)); 64 positions for a new Inspectional Services Command to be phased in over a three-year period (Recommendation 4.12); and additional fixed closed circuit television cameras to be installed over a five-year period. (Recommendation 7.15).⁷

⁶ The status of the remaining recommendations is set forth in Appendix 3 attached to this Report.

⁷ The Board also approved funding for five new positions in the Advocacy Unit and five support positions to enhance and expand the fixed Closed Circuit Television Cameras.

The Department reports that it has assigned the six Compliance Lieutenants to each of the jail facilities (with one to North and South), 14 personnel to the Custody Training and Standards Bureau, seven additional investigators to IAB, and 13 additional investigators to ICIB, and that it began assigning additional supervisors to Custody operations on October 20, 2013, using overtime funds. It is also in the process of upgrading the computer system; administering the sergeants exam and promoting deputies who will become supervisors in Custody operations; and identifying and assigning personnel for the Inspectional Services Command. Once the Board selects an Inspector General, it will be incumbent upon that person to monitor the Department's full implementation of these recommendations in the future to ensure that the Department fills these positions in accordance with its funding requests and the Board's approvals.

The Department has completed its assessment of the operational needs of its jail facilities (Recommendation 4.11) and will be seeking the Chief Executive Office's approval for additional clerical staff to handle administrative responsibilities that sworn deputies and Custody Assistant now handle. The deputies and Custody Assistants would be assigned to reduce some CARP assignments and/or overtime, which may offset the funding for the additional clerical staff. There are two remaining recommendations that do not require additional funding to implement: additional body scanners (3.12) and the utilization of more Custody Assistants (Recommendation 6.7).

IMPLEMENTATION STATUS

CHAPTER 3: USE OF FORCE

On January 1, 2013, the Department promulgated a new Use of Force Policy. Pursuant to the Commission's recommendations, the Department distributed to each

Deputy Sheriff and Custody Assistant a comprehensive Use of Force Manual (the “Force Manual”) relating to the use and reporting of force by Department personnel. The Department’s revised Force Manual was published on July 22, 2013. The Department has now assigned to each facility Compliance Lieutenants who will be responsible for analyzing inmate grievances about use of force. In addition, the Department is now able to track inmate grievances by deputies’ names in the Personnel Performance Index (PPI) and the Board has approved funding to further upgrade the Department’s data tracking system.

The following summarizes the status of the Department’s implementation of each of the Commission’s specific Use of Force recommendations:

3.1. LASD should promulgate a comprehensive and easy-to-understand Use of Force Policy in a single document.

Implemented

The Department’s Use of Force Policy is set forth in a single Force Manual (revised) that reflects (1) overall principles, including force prevention principles and an anti-harassment policy; (2) provisions providing guidance regarding use of force; (3) lists of approved weapons; and (4) requirements for the reporting of uses of force.

3.2. LASD personnel should be required to formally acknowledge, in writing, that they have read and understand the Department’s Use of Force Policy.

Implemented

The Department has created an Acknowledgement and Agreement Form that each Deputy Sheriff and Custody Assistant is required to sign.

3.3. All LASD personnel should be provided training on the new Use of Force Policy.

Implemented

The Department reports that over 98% of sworn personnel have received training in the new Force Policy.

3.4. The Department's Use of Force Policy should reflect a commitment to the principles of the Force Prevention Policy and prohibit inmate retaliation or harassment.

Implemented

The MPP and the Custody Division Manual set forth the principles of the Force Prevention Policy, and the Custody Division Manual prohibits retaliation against, or harassment of, inmates. These sections are included in the Force Manual.

3.5. LASD's Use of Force Policy should be based upon the objectively reasonable standard rather than the Situational Use of Force Options Chart.

Implemented

Sections 3-10/020.00 and 3-10/030.00 of the MPP reflect the objectively reasonable standard, and references to the Situational Use of Force have been deleted in the revised Force Manual. Pursuant to the Consultants' recommendation, Section 3-02/035.05 of the Custody Division Manual includes references to the factors set forth by the United States Supreme Court in *Hudson v. McMillian*, 503 U.S. 1 (1992) relating to the use of force in a custody setting.

3.6. The Use of Force Policy should articulate a strong preference for planned, supervised, and directed force.

Implemented

The Force Prevention Policy set forth in the MPP and the Custody Division Manual generally reflects a preference for planned, supervised, and directed force. In addition, the Department has added Section 3.02/035.10 to the Custody Division Manual, which reads as follows: “When force is required, every effort shall be made to plan, supervise, and direct force in an effort to control confrontations in a calm and professional manner.”

3.7. The Use of Force Policy should account for the special needs populations in the jails.

Implemented

The Department has added Section 3-02/035.15 to the Custody Division Manual, which reads as follows: “If a situation arises involving a special needs inmate, the appropriate mental health staff should be consulted, whenever possible, prior to the planned use of force.” In addition, there are provisions in the Force Manual relating to pregnant inmates and the Jail Mental Evaluation Team that further implement this recommendation.

3.8. PPI and FAST should be replaced with a single, reliable, and comprehensive data tracking system.

In progress (funding approved)

On October 8, 2013 the Board approved \$3.4 million to fund the Department’s proposed Information System Overall over three years through fiscal year 2015-16.

3.9. Inmate grievances should be tracked in PPI by the names of LASD personnel.

Implemented

The Department is now able to track inmate grievances in PPI by the name of the Deputy Sheriff or Custody Assistant. On November 4, 2013, the Department provided me with a demonstration of its ability to track the grievances in PPI by the name of Department personnel and to access the actual inmate complaint through PPI. This will enable the Discovery Unit to timely respond to Pitchess' motions and Court orders for inmate complaints against Department personnel. It will also enable the command staff in Custody Operations and in the jail facilities to track the Department's investigations of inmate complaints and identify Department personnel with a problematic number of complaints.

The Department has been using the new module in PPI for inmate grievances since October 27, 2013. The Department is still using the FAST database for inmate complaints prior to that date, and it is in the process of determining how to transfer complaints going back five years to PPI.

3.10. LASD should analyze inmate grievances regarding the use of force incidents.

Implemented

The Department has established the position of Risk Management Lieutenant in the Custody Training and Standards Bureau to implement this recommendation to analyze inmate grievances related to the use of force at the Custody Division level. The Department also has established the position of Inmate Grievance Coordinator, who will review and analyze all inmate grievances. (See Recommendation 7.14.)

On October 8, 2013, the Board approved the Department's funding request for six Compliance Lieutenants, who will review and analyze inmate grievances at the unit level. On October 21, 2013, the Department promulgated an addition to the Custody Services Division Manual, Section 2-01-060.05, setting forth the duties of the Compliance Lieutenants to "review and analyze inmate grievances" and "identify potential at-risk employees as it relates to force, conduct, and inmate grievances." On the same day, the Compliance Lieutenants were assigned to five of the facilities (one to North and South and one to each of the other facilities except the Inmate Reception Center (IRC)). The remaining Compliance Lieutenant for IRC was in place as of November 3, 2013.

3.11. Statistical data regarding use of force incidents needs to be vigilantly tracked and analyzed in real time by the highest levels of LASD management.

Implemented.

At the beginning of the year, Department personnel provided me with daily and monthly statistical reports and monthly force analysis used by Department managers to track and analyze use of force incidents in the jails. I recently reconfirmed with senior management their continued use of these reports to track and analyze force incidents and force trends often on a daily basis. Senior managers get daily force briefings and look at tapes of incidents to proactively identify issues and trends, and critically evaluate policies and procedures.

3.12. Department should purchase additional body scanners.

In progress

Although funding for the scanners was approved by the Board last year, and the Department initially reported to the Board a June 1, 2013 "target" date, the purchase and installation of the scanners has been repeatedly delayed and now there is some concern

about the suitability of the scanners for use on inmates who may be subject to multiple scans that require an unclothed body search. The Department plans to install the scanners in three phases. In phase one, two body scanners that the Department has already purchased should be operational at IRC by January 7, 2014. There will be a 30-day period specified in the Site Acceptance Agreement “to determine if the scanners are working as specified in the contract.” Next there will be a 90-day pilot program to “review,” among other things, “inmate flow,” “user station placement and staffing issues.” In phase two, two additional scanners will be installed in IRC, one at CRDF, and two at MCJ. During that period, the Department will “assess the need for additional machines at MCJ [and CDRF.]” Phase three will involve the installation of scanners at Twin Towers, NCCF, North and South that “will be determined at a later date.” The number of additional machines will be determined based upon the Department’s experience in the first two phases of the roll-out.

CHAPTER 4: MANAGEMENT

The Sheriff has extensively re-organized the management of the Department. The Department now has four Assistant Sheriffs who are responsible for overseeing Custody Operations, Patrol Operations, Countywide Services, and Administration & Professional Standards, and who report directly to the Sheriff. The Sheriff also has appointed a Chief of Staff and a Chief of a new Internal Investigations Division, who report directly to him.

Following the Commission’s recommendation, the Sheriff appointed an Assistant Sheriff who is responsible for only the Department’s Custody Operations. She has reorganized the Custody Division into a Custody Services Division – General Population and a Custody Services Division – Specialized Programs under Chiefs who report

directly to her. The Assistant Sheriff and the two Chiefs have their offices near each other on the eighth floor of the Twin Towers Correctional facility. An Administrative Commander who has been responsible for the implementation of the Commission's recommendations also has her office on the eighth floor of Twin Towers and reports directly to the Assistant Sheriff for Custody Operations.

The Department has completed its Administrative Investigations, and the four high level managers who directly or indirectly had supervision over the jails during the periods reviewed by the Commission have now all left the Department. The result is an entirely new team directly accountable to the Sheriff for Custody Operations.

Finally, on October 8, 2013, the Board approved funding for 64 new positions phased in over a three-year period to staff an Inspectional Services Command. The Department is in the process of identifying and assigning personnel for this Command.

Set forth below are summaries of the Department's implementation of each of the Commission's Management recommendations.

4.1. The Sheriff must be personally engaged in oversight of the jails.

Implemented

With the formation of the Commander Management Task Force in October 2011, the Sheriff personally directed the reform of the jails. In our meetings, he has assured me that he remains engaged in the oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations. The Sheriff and Assistant Sheriff for Custody Operations both advised me that they discuss Custody Operations several times a week and that the Sheriff is immediately advised of significant events in the jail facilities. In addition, the Sheriff conducts weekly EPC meetings with all of the Assistant

Sheriffs and Chiefs in the Department in which Custody issues are discussed and often take up a significant portion of the meetings.

4.2. The Sheriff must hold his high level managers accountable for failing to address use of force problems in the jails.

Implemented.

Based upon the Sheriff's management changes (both in terms of structure and personnel), the results of the Administrative Investigations, and the timing of the retirements of the four managers who had oversight responsibility over the jails, it is generally perceived in the Department that these managers retired due, at least in part, to their failures to address adequately the use of force problems in the jails. Although I believe that the process took too long – the high level managers retired over the period from March 2012 through August 2013 – at this point there is nothing further for the Department to do in order to hold these managers accountable and implement this recommendation.

4.3. The Undersheriff should have no responsibility for Custody operations or the disciplinary system.

Implemented

In January 2013, the Sheriff issued "Sheriff's Bulletin #593" entitled "Executive Reporting Procedures" to implement this recommendation. Under the reorganization, the Assistant Sheriff for Custody Operations reports directly to the Sheriff. IAB and ICIB now report to the Sheriff through the recently appointed Chief of the Internal Investigations Division. Further, the Undersheriff retired on August 1, 2013.

4.4. The Department should create a new Assistant Sheriff for Custody position whose sole responsibility would be the management and oversight of the jails.

Implemented.

The Sheriff has appointed an Assistant Sheriff who is responsible for Custody Operations. She assumed her duties on March 18, 2013. Effective July 1, 2013, she reorganized the Custody Division into two Custody Services Divisions, one for General Population and one for Specialized Programs. Each of the Divisions is headed by a Chief who reports directly to the Assistant Sheriff for Custody Operations. By having an Assistant Sheriff focused only on Custody Operations housed in close proximity to her executive team, there is greater communications and more focus on proactively identifying issues in the jail facilities and ensuring the necessary follow-up to resolve these issues. The Assistant Sheriff meets weekly with the Chief and Commanders in Custody Operations and the Chiefs, in turn, meet weekly with the Commanders, Captain and Operations Lieutenants. One senior manager told me that the Department is doing things in Custody Operations in terms of planning, managing, communicating and follow-up that the Department “has never done.”

4.5. The Sheriff should appoint as the new Assistant Sheriff for Custody an individual with experience in managing a large corrections facility or running a corrections department.

Implemented.

The Sheriff interviewed the top tier candidates and appointed an Assistant Sheriff for Custody Operations who has extensive experience in running a corrections department. The new Assistant Sheriff for Custody Operations Terri McDonald is a hands on manager who brings additional knowledge and expertise as a result of her experience with California correctional system.

4.6. The Assistant Sheriff for Custody should report directly to the Sheriff.

Implemented

“Sheriff’s Bulletin #593” entitled “Executive Reporting Procedures” provides that each of the Assistant Sheriffs, including the Assistant Sheriff for Custody Operations, reports directly to the Sheriff.

4.7. The Commander Management Task Force should not be a permanent part of Custody management.

Implemented

The Sheriff’s Bulletin #593 and the new organization charts do not include a role for the Commander Management Task Force in Custody management.

4.8. The Sheriff must regularly and vigilantly monitor the Department’s Use of Force in the jails.

Implemented

Since at least the formation of the Commander Management Task Force in October 2011, the Sheriff has been monitoring the level of force in the jails. He remains engaged in oversight of the jails through regular communications with the new Assistant Sheriff for Custody Operations.

4.9. The Department should implement SCIF [the Sheriff’s Critical Incident Forum] on the Custody side to improve the accountability of jail supervisors.

Implemented

This recommendation has been implemented pursuant to a Custody Division Directive, dated December 13, 2012, issued by the then Chief of the Custody Division. A Custody Division SCIF took place on February 12, 2013, to review statistics relating to the operations of the Custody Division. The next SCIF for Custody Operations has been re-scheduled for November 14, 2013.

4.10. Senior management needs to be more visible and engaged in Custody.

Implemented

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chiefs, the Area Commanders, and the Jail Captains to “maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department’s Core Values.” The Assistant Sheriff for Custody Operations advised me that she and her Division Chiefs and Commanders regularly walk through the jail facilities. Similarly, the Chiefs have advised me that they regularly walk through the facilities and set their expectations for their Unit Commanders to know their facilities and inmate populations, which require them to maintain a visible presence in their facilities.

4.11. Management should be assigned and allocated based on the unique size and needs of each facility.

In progress (funding request anticipated)

The Department has analyzed the operations staff of each of the jail facilities and completed a Custody Division Staff Assessment (Proposed) that would reassign 10 Deputy Sheriffs and nine Custody Assistants and replace them with clerical staff (Operations Assistant I, Senior Typist Clerk and Intermediate Typist Clerk). Should the proposal be accepted by the Chief Executive’s Office and the new clerical staff approved, the Department plans to offset the additional funding for these new clerical positions by assigning the 19 Deputy Sheriffs and Custody Assistants to positions that would reduce CARP assignments and overtime in Custody Operations.

4.12. LASD should create an Internal Audit and Inspection Division.

In progress (funding approved)

On October 8, 2006, the Board approved the Department's funding request for the creation of an Inspectional Services Command to be phased in with 23 positions in this first fiscal year and a total of 64 over a three-year period. The Sheriff has appointed a Captain to the Command and the Department expects to have three lieutenants assigned to the Command by November 24, 2013, at which point the Department will begin the interviews for sergeants and professional staff. With respect to the hiring of auditors who are not currently Department personnel, the Department anticipates that, after approval of the new positions by the Chief Executive's Office, it will take a period of time to conduct a job analysis, post the job bulletin, review applications, administer examinations, and post a qualified list before the Department can actually hire outside auditors.

4.13. The Department should have a formal policy to address campaign contributions.

Implemented

On January 31, 2013, the Department issued revised Section 3-01/070.05 (Political Activity) and Section 3-01/070.07 (Prohibited Political Activity and Other Conflicts of Interest) of the MPP.

4.14. LASD should participate in collaborations such as the Large Jail Network that would enable it to learn about best practices and approaches in other systems.

Implemented

The Department has joined the Large Jail Network. Members of the Custody Division attended the American Jail Association National Training Conference in May and the Southern California Jail Managers earlier this year. One of the Chiefs attended

the Large Jail Network conference in September and several managers attended the statewide realignment conference in October.

CHAPTER 5: CULTURE

As noted in my earlier reports, the Department has emphasized respect for and communications with inmates through the Force Prevention Policy, the Education Based Incarceration program, and Town Hall meetings. It has enhanced the training of new Custody Division personnel in the principles of the Force Prevention Policy, ethics, and destructive cliques, and it is in the process of establishing a Custody Training and Standards Bureau that will provide additional training to current Custody deputies and Custody Assistants. It also has established a Dual Track Career Path that will provide deputies with an opportunity for a career in Custody Operations and administered a supervisors examination to deputies in Custody as well as Patrol. The Department has also enhanced the penalty guidelines for dishonesty to further address the culture problems identified by the Commission. Finally, each facility has developed a rotation policy taking into consideration its size, configuration, and inmate population.

Set forth below are summaries of the Department's implementation of each of the Commission's recommendations regarding the culture in Custody Operations.

5.1. The Department must continue to implement reforms that emphasize respect for, engagement of, and communications with inmates.

Implemented

Based upon my conversations and meetings with the Sheriff and with members of the Command staff and Unit Commanders; my review of policies, directives, and reports; my tours of jail facilities; and input from the Consultants and outside observers, it is apparent that the Department is committed to implementing the reforms recommended by

the Commission, enhancing respect for and communications with inmates, and changing the culture in the Custody Division. In the Commanders meeting I attended, the Chiefs of the Custody Divisions emphasized the Education Based Incarceration program and Force Prevention Principles. The changes in the culture are reflected in the principles set forth in the Force Prevention Policy, the Anti-harassment Policy, the Education Based Incarceration program, the numerous Town Hall meetings with inmates, the Department's responses to inmate grievances, and its progress in implementing the Commission's recommendations.

5.2. The Department's Force Prevention Policy should be stressed in Academy training and reiterated in continuing Custody Division training.

Partially implemented (funding approved)

This recommendation has been implemented for new deputies, and 98% of the existing staff has received training in the new Use of Force Policy, which incorporates the Force Prevention Principles. As discussed below, the Board has now approved funding for a Custody Training and Standards Bureau, which will be phased in over a three-year period. (See Recommendation 6.3.) Additional training in the Force Prevention Policy will be part of the curriculum once the bureau is staffed. The Department expects to train 20% of the line staff in a newly developed Use of Force curriculum in the first year.

5.3. The Department should enhance its ethics training and guidance in the Academy as well as in continuing Custody Division training.

Partially implemented (funding approved)

Academy training covers "Department Ethics and Standards," including "CORE Values" and "Critical Decision Making" and the Jail Operations Continuum covers

“Valued Communications” and “Value Based Decision Making.” Additional ethics training for the existing staff will be part of the Custody Training and Standards Bureau curriculum once it is staffed. The Department expects to train 20% of the line staff in a newly developed ethics curriculum in the first year.

5.4. The Department must make Custody a valued and respected assignment and career.

Implemented.

Sheriff’s Bulletin # 594, dated February 1, 2013, announced that the Department has established a Dual Track Career Path that allows new recruits to select a career in Custody and allows Deputy Sheriffs currently assigned to Custody to remain in Custody assignments. It also allows Deputy Sheriffs and supervisors to promote up to the position of Chief of the Custody Division without going out to a patrol assignment. Under the Dual Track Career Path program, custody personnel are eligible to take, and are taking, the supervisory exams currently being administered by the Department. One of the senior leaders in Custody Operations advised me that Custody “quality personnel are being asked to come to custody.”

5.5. Senior leaders must be more visible in the jails.

Implemented.

The Department has amended the job descriptions in the Custody Division Manual so that they now require the Assistant Sheriff - Custody Division, the Custody Division Chief, the Area Commanders, and the Jail Captains to “maintain a visible presence within the [assigned] jail facilities to help ensure proper adherence to policy and the application of the Department’s Core Values.” (See Recommendation 4.11 above.)

5.6. LASD must have a firm policy and practice of zero tolerance for acts of dishonesty that is clearly communicated and enforced.

Implemented

New disciplinary guidelines were published on February 17, 2013, that enhance the penalties for dishonesty.

5.7. The Department should have a sensible rotation policy to protect against the development of troubling cliques.

Implemented

As a result of my meetings with a Working Group formed by the Department, it was decided that, instead of a single rotation policy for the entire Custody Division, the Unit Commanders would develop their own rotation policies for each of the facilities. The policies would rotate deputies who regularly have contact with inmates, including deputies in “key positions,” among job assignments to address the Commission’s concern about deputy cliques, taking into consideration the facility’s size, configuration and inmate population to ensure the safety and security of the staff and inmates. Following these meetings each of the Unit Commanders issued a unit directive rotating deputies among job assignments in each facility.

As a result of the Assistant Sheriff’s reorganization of the Custody Operations, some of the jail facilities have new Unit Commanders. On July 25, 2013, I met with the Unit Commanders and asked them to review the rotation policies for their facilities and either reaffirm the policy or make adjustments as appropriate, and I have now received updated or re-confirmed policies for each of the facilities.

The Department has also conducted audits to ensure compliance with the rotation policies, and it reports following percentages of compliance: IRC (100%), NCCF (100%), MCJ (97.6%), CDRF (90%), TTCF (88.7%) and South (82.6%).

5.8. LASD should discourage participation in destructive cliques.

Partially implemented (funding approved)

The subject of destructive cliques is covered for new Deputy Sheriffs in the Jail Operations Continuum. Additional training will be provided to other Custody personnel through the Custody Training and Standards Bureau once it is staffed. Further, each of the jail facilities has a rotation policy that is intended to discourage participation in destructive cliques.

CHAPTER 6: PERSONNEL AND TRAINING

The Board has now approved funding for the creation of a Custody Training and Standards Bureau that will develop a robust post-Academy training program for both new and existing Custody personnel. The Department has already begun to staff the bureau.

The Board also approved funding for 91 new supervisors over a two-year period. Using overtime funds, the Department has assigned additional supervisors who will be replaced in December by 25 new sergeants.

The Department also has frozen Deputy Sheriff positions to increase in the ratio of Custody Assistants to Deputy Sheriffs to achieve the agreed upon 65/35 ratio. The Department has conducted an initial analysis of what other Deputy Sheriff positions may be handled by Custody Assistants, and it plans to ask one of the Consultants to review and comment on the analysis.

The Department's implementation of the Commission's specific Personnel and Training recommendations are set forth below.

6.1. The Department should review and revise its personnel and training procedures to reflect Custody's status as a valued and important part of the Department.

Partially implemented (funding approved)

The Dual Track Career Path was established on February 1, 2013. In addition, the Department has expanded its Custody training through the Jail Operation Continuum, and is creating a Custody Training and Standards Bureau that will develop a comprehensive training program for Custody Operations.

6.2. The Department should develop and implement a long-range and steady hiring plan based upon normal attrition.

Implemented

A Sworn Vacancy Projection submitted by Personnel Administration to the Commander Management Task Force on October 2, 2012 reflects "a strategic plan to consistently hire deputies through 2017" to fill vacancies and hire additional deputies based upon normal attrition. A Sworn Hiring Projection submitted by Personnel Administration on November 6, 2013, reflects 352 Academy graduates in 2013 (slightly more than the October 2012 projection of 320 graduates). Personnel Administration anticipates that it will "continue scheduling five academy classes a year with approximately 80 recruits per class, yielding approximately 320 new hires each year," which are "contingent on the Department's reduction, expansion, internal and external budgetary and fiscal considerations.

6.3. Deputies and supervisors should receive significantly more Custody specific training overseen by the Department's Leadership & Training Division.

Partially implemented (funding approved)

The Department has implemented this recommendation for new deputies.

Consistent with the long-term goal of setting up a separate Custody Division (*see* Recommendation 6.10) and the Dual Track Career Path, the Department plans to enhance significantly the training of Custody personnel through the new Custody Training and Standards Bureau.

On October 8, 2013, the Board approved funding for 32 new positions to be phased in over a three-year period to be assigned to the Custody Training and Standards Bureau in addition to 24 existing positions assigned to staff the bureau. The Department has already assigned 14 of the 19 phase-one new personnel to the bureau. Three additional bonus deputies are expected to be assigned in December.

6.4. There should be a meaningful probation for new deputies in Custody.

Implemented

Effective January 11, 2013, Custody Division Directive 12-005 provides that "at the completion of the employee's sixth month" of employment, the shift Lieutenant will be conducting "a thorough inquiry of the employee's personnel performance." Thereafter, "three or four weeks prior to the employee's one year anniversary the Unit Commander or designee shall conduct another personnel performance review and schedule a face to face meeting." Before an employee can complete probation, the Unit Commander is supposed to "draft a memorandum to memorialize the employee's successful completion of the probationary period."

6.5. The number of supervisors to deputies should be increased and the administrative burdens on Custody supervisors should be minimized.

Partially implemented (funding requested)

On October 8, 2013, the Board approved the funding for 91 positions to be phased in over a two-year period. The Department assigned additional supervisors in Custody beginning on October 20, 2013, using overtime funds. The Department intends to assign 25 new sergeants to replace the supervisors on overtime in Custody by December 2013. It anticipates an additional 30 new sergeants in Custody by March 2014, and another 30 new sergeants by April 2014.

6.6. The Department should allow deputies to have a career in Custody and take steps in the interim to decrease the length of new deputy assignments to Custody.

Implemented

The Dual Track Career Path established on February 1, 2013, allows deputies to have a career in Custody and to promote from within Custody Operations. Custody deputies are eligible for the supervisory examination that the Department is currently administering

6.7. The Department should utilize more Custody Assistants.

Partially implemented

The Department froze 81 identified Deputy Sheriff positions, and it reports that it has now achieved the 65/35 ratio provided in the Memorandum of Understandings with the Deputy Sheriffs' union (ALADS) and the Custody Assistants union (PPOA). The Department has completed an initial analysis of deputy positions to determine the feasibility of moving beyond the 65/35 percent ratio and is planning to ask the Consultants to review and comment on this analysis. Any change in the 65/35 ratio is

likely going to require a more detailed analysis and would be subject to “meet and confer” obligations with ALADS and PPOA.

6.8. Rotations within and among proximate facilities should be implemented.

Implemented (within facilities)

As discussed above (see Recommendation 5.7), the Department has implemented rotation policies in each of the facilities and audited compliance with those policies. It reports that it was not able to implement a voluntary rotation among the north county facilities, and that it would need the agreement of the deputies’ union to implement rotations among the facilities, which the union adamantly opposes. Further, it reports that it has decided not to rotate newly assigned deputy sheriffs at the beginning of their fourth month of training to “a proximate facility” in the south or in the Pitchess Detention Center in the north. The Custody managers believe that they should continue to evaluate the effectiveness of the rotations within facilities and other measures they have taken to discourage cliques before trying to rotate new deputies among proximate locations because of the logistical and other problems with such rotations among facilities.

6.9. The Department’s Mission Statement should be changed to reflect the importance of Custody.

Implemented

6.10. The Department should create a separate Custody Division with a professional workforce.

In progress

This is a long-term goal that the Department has begun to address. The Sheriff has selected a new Assistant Sheriff for the Custody Division and implemented the Dual Track Career Path on February 1, 2013. Establishing a Custody Training and Standards

Bureau and increasing the ratio of Custody Assistants to Deputy Sheriffs will further implement this recommendation, but given the number of deputies who are hired each year, it will take several years before the Custody Division could be staffed exclusively with new deputies who want careers in Custody so that new deputies who want careers in patrol can go directly to patrol.

CHAPTER 7: DISCIPLINE

The Department has agreed to revamp its investigative and disciplinary system to assign all Administrative Investigations of Category I force incidents to the new Compliance Lieutenants and the Administrative Investigation of Category II force incidents to Internal Affairs Bureau (IAB). The Sheriff has created an Internal Investigations Division and appointed a Chief of the Division to oversee IAB and the Internal Criminal Investigations Bureau (ICIB). The Department also has enhanced the penalties for dishonesty and excessive force, and the Custody Force Review Committee is rigorously reviewing Use of Force Packages. In addition, the Force Manual has now been revised to clarify the policies with respect to the review of videotaped footage and the separation of deputies involved in force incidents.

On October 8, 2013, the Board approved the Department's request for six Compliance Lieutenants, 28 additional IAB investigators, 40 additional ICIB investigators, and seven new positions in the Internal Investigations Division. The Department has now assigned the six Compliance Lieutenants to the facilities and seven new IAB investigators, and it has permanently assigned to ICIB 13 investigators who were previously on loan to ICIB

Set forth below are summaries of the Department's implementation of each of the Commission's Discipline recommendations.

7.1. The investigative and disciplinary system should be revamped.

Partially implemented (funding approved)

Under the revamped investigative system, Compliance Lieutenants are now conducting all Administrative Investigations of Category 1 force incidents (*See* Recommendation 7.8), and IAB will begin conducting all Administrative Investigations of Category 2 force incidents on January 1, 2014.

On October 8, 2013, the Board approved the funding for six Compliance Lieutenants, who have now been assigned to each of the facilities (with one assigned to cover both North and South). The Board also approved the funding for 28 new positions in IAB and 40 new positions for ICIB that will be phased in over a three-year period. Seven new positions have now been assigned to IAB and 13 positions on loan to ICIB have now been permanently assigned to IAB. Finally, the Board approved the funding for seven new positions to staff the Internal Investigations Division, which oversees IAB and ICIB. These positions have already been assigned to this Division.

7.2. The CFRC [Custody Force Review Committee] should monitor Force Packages for trends and concerns and the performance of supervisors.

Implemented

One of the Consultants attended two CFRC meetings "and he watched the process of evaluation and follow-up related to the incidents involving several different force incidents." He advised that he was "impressed with the manner in which candid and direct examinations of Captains, Lieutenants, and Sergeants [who were] responsible for [the] force incidents takes place." The CFRC assesses, among other things, "whether the

force response was reasonable to the threat perceived” and “whether there may have been a force response of lesser magnitude more appropriate to the threat.” He further reported that “[i]n my experience, the establishment of standard and expectations by the executive management is the first step in changing a culture. The CFRC is clearly a big part of that proposition as it pertains to the use of force in the jails.” I attended a CFRC meeting on March 13, 2013, and also was impressed with the analysis and the way in which the CFRC holds the unit supervisors responsible for the quality of their force reviews.

7.3. Deputies should be required to provide a timely written report of force incidents and not be allowed to review video tape footage prior to the completion of that report or any interviews.

Implemented

The revised Force Manual (Sections 3-10/100.00 and 3-10/115.00 of the MPP) sets forth these requirements.

7.4. Deputies involved in Significant Force incidents should be separated and not permitted to talk to each other until they have provided a written statement or have been interviewed by investigators.

Implemented

The revised Force Manual (Section 3-10/110.00 of the MPP) sets forth this requirement.

7.5. IAB and ICIB should be part of an Investigation Division under a Chief who would report directly to the Sheriff.

Implemented

The Department implemented this recommendation on March 1, 2013, effective March 3, 2013. The Board has now approved the Department’s request for additional administrative resources to fully staff its Internal Investigations Division.

7.6. IAB should be appropriately valued and staffed by personnel that can effectively carry out the sensitive and important work of that bureau.

Partially implemented (funding approved)

The Department has provided information showing that IAB investigators have often been promoted from IAB. The Board has now approved the Department's request for the funding for 28 additional IAB positions to be phased in over a three-year period. The Department filled seven of the 10 new phase-one IAB positions as of November 3, 2013. In addition, the Board approved the Department's request for the funding for 40 additional ICIB positions that will also be phased in over a three-year period. 13 positions on loan to ICIB have now been permanently assigned to ICIB.

7.7. The Disciplinary Guidelines should be revised to establish increased penalties for excessive force and dishonesty.

Implemented

The Department has implemented this recommendation by enhancing penalties for excessive force and dishonesty.

7.8. Each jail should have a Risk Manager to track and monitor use of force investigations.

Implemented

On October 8, 2013, the Board approved the funding for six Compliance Lieutenant positions that have now been assigned to each of the facilities (with one for the North and South facilities). These Lieutenants will conduct Administrative Investigations of Category 1 Force Incidents, analyze inmate grievances regarding force in each facility, and monitor and track force investigations at the unit level.

7.9. Force investigations should not be conducted by deputies' supervisors.

Partially implemented (funding approved)

Under the revamped investigative system, if the Unit Commander determines that a use of force may have violated Department policy or involved misconduct, the Administrative Investigation of a Category 1 Force Incident (no injury) will be conducted by the Compliance Lieutenants who will not be supervising any of the deputies. Beginning on January 1, 2014, the Administrative Investigation of a Category 2 Force Incident (involving injuries to inmates) will be conducted by IAB.

7.10. Captains should not reduce charges or hold penalties in abeyance for use of force, dishonesty, or failure to report force incidents.

Implemented

The Department's penalty guidelines effective February 17, 2013, require suspension days (that is, penalties without pay), and preclude Education Based Discipline (that is, holding suspension days in abeyance), for dishonesty, excessive use of force, or failure to report force. The Department implemented a new management protocol effective September 1, 2013, that requires captains hearing employee grievances to consult with senior Department officials and the Office of Independent Review and articulate a factual and legal basis prior to modifying any findings and/or recommended discipline for dishonesty, excessive force, or failure to report force.

7.11. The Department should vigorously investigate and discipline off-duty misconduct.

Implemented

The Department has provided me with a report of the results of investigations and the discipline imposed for off-duty misconduct from the beginning of the second quarter

of 2011 through the end of the second quarter of 2013, which confirms that this recommendation has been implemented.

7.12. The Department should implement an enhanced and comprehensive system to track force reviews and investigations.

Implemented

The Department has demonstrated that the Electronic Line Operations Tracking System (e-LOTS) is a comprehensive system that can be used to track force reviews and investigations. It has now implemented a policy that requires all custody facilities to use e-LOTS to track Use of Force packages. Each Unit Commander is required to “ensure that all necessary information about each force incident [is] entered into e-LOTS prior to the end of the shift in which the incident occurred,” and the Unit Commander or Operations Lieutenant is required to track in e-LOTS on a weekly basis all force reviews and contact the appropriate supervisor “if the preparation or review of the Force Package is overdue.” Eventually, e-LOTS will be replaced by CARTS, which will be used to track force reviews and investigations.

7.13. Inmate Complaints should be tracked by deputies’ names in PPI.

Implemented

The Department is now able to track inmate grievances by staff names in PPI.
(See Recommendation 3.9.)

7.14. The inmate grievance process should be improved and include added checks and oversight.

Partially Implemented

The Department is working to enhance the inmate grievance process, including a system for inmates to submit grievances on IPADS and for tracking electronically the

Department's handling of the grievances. The Department is also planning to input inmate requests and grievances into the CARTS database from which it will be able to obtain more reliable data and reports about the requests and grievances. The CARTS deployment began at the North facility on November 5, 2013 and is scheduled to be completed at all of the facilities by March 3, 2014.

The Department has amended its policies to require Unit Commanders to review all personnel complaints of retaliation, which are forwarded to Custody Operations headquarters and the Office of Independent Review, reviewed by a commander at the direction of the Chief of the Division, and forwarded to the appropriate unit to handle. All allegations of retaliation are to be entered into the FAST system.

The Department has appointed an Inmate Grievance Coordinator at the rank of lieutenant who will oversee the Department's handling of inmate complaints. The Coordinator reviews monthly analyses of inmate complaints and service requests within the Custody Services Divisions. In addition, the Coordinator will be reviewing the inmate grievances that are now going to be recorded in the PPI database and also a pilot of the inmate grievance module in CARTS that will begin at the North Facility on November 5, 2014. The Unit Commanders will respond to any findings of irregularities and the Coordinator will report his or her findings to the Division's Risk Management Lieutenant and senior management. The Department also intends to audit the inmate grievance system twice a year by Custody Division Commanders and once a year as part of the Command Inspections.

Beginning on November 5, 2013, the Department started a pilot program, whereby inmates in trustee dorms in Men's Central Jail and CRDF will have access to

IPAD kiosks that will allow them to submit their requests for service and personnel complaints to the Department electronically. The request/grievance will be routed to the personnel assigned the responsibility for responding (for example, in the case of a grievance against a deputy, it would automatically go to the deputy's supervisor) and, in the case of a grievance, it will be entered into PPI so that the Department's investigation can be monitored and it can be tracked by the name of the Department's personnel against whom the grievance was made. The Department will also be able to run exception reports to determine if the service requests have been fulfilled or the grievances investigated and addressed. The Department plans to run the pilot program through February 4, 2013. If the pilot program is successful and funding is available for network upgrades, subject to procurement timeline constraints and the availability of facility resources for electrical installations, the Department intends to implement the system Division-wide possibly within 14 months after completion of the pilot program.

7.15. The use of lapel cameras as an investigative tool should be broadened.

In progress (Alternative Implementation)

In response to the recommendation of the Board of Supervisors, and also the Commission's encouragement, the Department "conducted a test and evaluation of representative forms of PVRDs ["Personal Video Recording Devices"] within MCJ and TTCF in order to assess the feasibility of implementing a larger scale deployment of PVRD technology at LASD." The Department's report "recommends a deployment of PVRDs exclusively at Men's Central Jail due to its prominence, historically higher liability operation, hazardous inmate classifications and overall impact such a deployment would have on the entirety of the Department." Taking into consideration

the considerable potential costs, the Department's report recommended an initial deployment that is "manageable in size, scalable in scope and should necessitate a minimal need for additional infrastructure upgrades." The Report also identifies several issues that still need to be addressed in the development and implementation of a PVRD policy, including working with the unions to gain acceptance of the use of the technology, whether it is a voluntary or mandatory program, and "cost model and options for network infrastructure versus cloud storage solutions." Ultimately, the Department believes that the funds for lapel cameras would be better spent on additional fixed cameras in the jails.

The Department submitted to the CEO a request for funding for additional fixed CCTV cameras to "enhance[] the system at MCJ, TTCF, and IRC, as well as to expand it to all of the other custody facilities." This proposal is essentially in lieu of additional lapel cameras because the "Department believes that the risk of investing in a technology that is rapidly evolving would likely mean that whatever product is purchased may be outdated before it is even deployed."

The Consultants believe that "[e]xpanded placement of CCTV cameras is needed, irrespective of any future decision to equip Deputies with PVRDs" and "there is a definite need for more cameras with better resolution to improve coverage and the quality of video recordings." They "believe that the greatest need for the CCTV system is at the MCJ, IRC and the TTCF because the majority of use of force incidents happen in these facilities" and that the "fixed camera system, in conjunction with audio recording capabilities can be expanded at a more reasonable cost than full deployment of PVRDs would require." With respect to PVRDs, they "feel that the Department would benefit

from a . . . limited and targeted testing in the jails” that could “be carried out in particular settings and situations such as controlled cell extractions or similar tactical deployments.”

On October 8, 2013, the Board approved \$26.35 million in funding for additional fixed cameras that will be installed in the jails over the next four years. In addition, in lieu of PVRDs, the Department intends to direct supervisors to equip themselves with handheld cameras when they respond to a force incident and capture as much of the incident on video and audio tape as possible. Given the need for additional fixed cameras, the infrastructure expenses associated with a full deployment of PVRDs, and the limitations in capturing force incidents with PVRDs worn by personnel involved in the force incident, the enhanced use of handheld cameras and additional fixed cameras is a reasonable alternative to additional PVRDs in a custodial setting.

CHAPTER 8: OVERSIGHT

8.2. The Department should report regularly to the Board of Supervisors on use of force and the status of Custody recommendations.

Implemented

Since the formation of the Commander Management Task force in October 2011, the Sheriff and/or the Assistant Sheriff for Custody Operations has regularly reported to the Board on the use of force in the jails and the implementation of the Commission’s recommendations.

CONCLUSION

With the funding approved by the Board, the Department has commenced to implement fully most of the remaining recommendations for additional supervisors, additional internal investigators, a Custody training bureau, an internal audit division, Compliance Lieutenants, and an upgraded computer system.

Appendix 1

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTED (I) PARTIAL (P) IN PROGRESS (IP) NOT STARTED (NS)				COMMENTS
USE OF FORCE	3.1	Comprehensive and easy-to-understand Use of Force policy in single manual	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.2	LASD personnel should be required to read and understand the new UOF policy	X				LASD implemented January 1, 2013.
	3.3	LASD personnel should receive training on the new UOF policy	X				On-going
	3.4	The Use of Force policy should reflect Force Prevention and anti-retaliation policies	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.5	The Use of Force policy should be based upon objectively reasonable standard	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	3.6	The Use of Force policy should reflect preference for planned, supervised, and directed force	X				Manual revised June 24, 2013
	3.7	The Use of Force policy should account for special needs populations	X				LASD implemented January 1, 2013. Manual revised June 24, 2013
	3.8	LASD should have a single, reliable and comprehensive data tracking system			X		Funding request approved by Board
	3.9	Inmate grievances should be tracked in PPI by names of LASD personnel	X				Completed
	3.10	LASD should analyze inmate grievances regarding use of force incidents	X				Compliance Lieutenants in place
	3.11	Use of force statistical data must be tracked and analyzed in real time by management	X				On-going
	3.12	LASD should purchase additional body scanners			X		Initial installation January 2014
12 USE OF FORCE RECOMMENDATIONS:			10	0	2	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

NO.	RECOMMENDATION	IMPLEMENTED (I) PARTIAL (P) IN PROGRESS (IP) NOT STARTED (NS)				COMMENTS
MANAGEMENT	4.1 Personal engagement by Sheriff in oversight of jails	X				On-going
	4.2 High level managers must be accountable for failing to address use of force problems	X				Admini investigations completed; responsible high level managers resigned/retired
	4.3 The Undersheriff should not have any responsibility for custody or discipline	X				Sheriff's Bulletin issued (January 7, 2013)
	4.4 LASD should create a new Assistant Sheriff position for Custody	X				New Assistant Sheriff for Custody appointed.
	4.5 The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	X				New Assistant Sheriff for Custody appointed.
	4.6 The Custody Assistant Sheriff should report directly to the Sheriff	X				Sheriff's Bulletin issued (January 7, 2013)
	4.7 The Commander Management Task Force should not be a part of Custody management	X				Sheriff's Bulletin issued (January 7, 2013)
	4.8 The Sheriff must monitor the use of force in the jails	X				On-going
	4.9 LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	X				December 13, 2012. Custody Division Directive.
	4.10 Senior management must be more visible in the jails	X				Position description amended.
	4.11 Operations support should be allocated based unique needs of each facility			X		Assessment completed
	4.12 LASD should created an Internal Audit and Inspection Division under a single Chief			X		Funding authorized; process of assigning and identifying personnel
	4.13 LASD should have a policy regarding campaign contributions	X				Implemented January 31, 2013
	4.14 LASD should participate in the Large Jail Network	X				On-going participation
14 MANAGEMENT RECOMMENDATIONS:		12	0	2	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTED (I) PARTIAL (P) IN PROGRESS (IP) NOT STARTED (NS)				COMMENTS
CULTURE	5.1	LASD must emphasize respect for, and communications with, inmates	X				On-going
	5.2	Force prevention policy should be stressed in Academy and Custody Division training		X			On-going for new deputies; funding approved for training bureau
	5.3	Ethics training should be enhanced in Academy and Custody Division training		X			On-going for new deputies; funding approved for training bureau
	5.4	Custody should be a valued and respected assignment and career	X				Dual track implemented February 1, 2013.
	5.5	Senior leaders must be more visible in the jails	X				Position description amended.
	5.6	LASD must have a zero tolerance policy for acts of dishonesty	X				Revised Guidelines effective 2/17
	5.7	LASD should have a sensible rotation policy	X				Rotation implemented at unit level
	5.8	LASD should discourage participation in cliques		X			On-going for new deputies; funding approved for training bureau
8 CUTURE RECOMMENDATIONS:			5	3	0	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTED (I) PARTIAL (P) IN PROGRESS (IP) NOT STARTED (NS)				COMMENTS
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department		X			Dual track implemented; Custody Training Bureau to be phased in over three-year period .
	6.2	LASD should develop and implement a long-range and steady hiring plan	X				Sworn Hiring Projections. Subject to funding.
	6.3	Custody personnel should receive significantly more Custody-specific training		X			Funding approved for Custody Training Bureau to be phased in over three-year period
	6.4	There should be a meaningful probationary period for Custody deputies	X				January 9, 2013 Probationary Period Memorandum.
	6.5	LASD should increase the number of Custody supervisors		X			Funding approved for two year phase in; initial additional supervisors assigned
	6.6	LASD should provide for careers in custody	X				Dual track implemented February 1, 2013.
	6.7	LASD should utilize more custody assistants		X			Department has achieved 65/35 ratio. Additional assessment completed. Meet and confer issue.
	6.8	LASD should implement rotations within and among proximate facilities	X				
	6.9	LASD should change its Mission Statement to reflect importance of Custody	X				
	6.10	LASD should create a separate Custody Division		X			Dual track implemented February 1, 2013; long-term goal for Department
10 PERSONNEL & TRAINING RECOMMENDATIONS:			5	5	0	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

	NO.	RECOMMENDATION	IMPLEMENTATION STATUS				COMMENTS
			IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	
DISCIPLINE	7.1	The investigative and disciplinary system should be revamped		X			Compliance Lieutenants now conducting C1 Admin Investigations
	7.2	The CFRC should monitor force packages	X				Risk Management Lieutenant also designated to monitor force packages
	7.3	Preclude deputies from reviewing videos before reporting use of force	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	7.4	Separate deputies involved in significant use of force incidents	X				LASD implemented January 1, 2013. Manual revised June 24, 2013.
	7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	X				Implemented March 1, 2013
	7.6	IAB should be appropriately valued		X			Funding approved for three-year phase-in for add IAB and ICIB personnel
	7.7	There should be enhanced penalties for excessive force and dishonesty	X				Revised Guidelines 2/17
	7.8	There should be a Risk Manager assigned to each custody facility	X				Compliance Lieutenants now assigned to jail facilities
	7.9	Force investigations should not be conducted by deputies' supervisors		X			Compliance Lieutenants now conducting CI Admin Investigations
	7.10	Use of force and dishonesty charges should not be reduced or held in abeyance	X				Revised Guidelines 2/17; management protocol 9/1/13
	7.11	LASD should vigorously investigate and discipline off-duty misconduct	X				On-going
	7.12	LASD should have an enhanced system to track force investigations	X				Implemented policy to use e-LOTS.
	7.13	Inmate use of force complaints should be tracked in PPI	X				Completed
	7.14	LASD should improve the inmate grievance process		X			Inmate grievance coordinator appointed. Developing pilot to electronically process and track grievances
	7.15	Increased use of Lapel Cameras			X		Funding approved for additional fixed CTTV cameras Funding requested
15 DISCIPLINE RECOMMENDATIONS:			10	4	1	0	

**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

NO.	RECOMMENDATION					COMMENTS
		IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	

OVERSIGHT	8.2 The Sheriff should regularly report to the Board of Supervisors	X				On-going
	1 OVERSIGHT RECOMMENDATION:	1	0	0	0	

TOTAL CCJV RECOMMENDATIONS	43	12	5	0
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**IMPLEMENTATION OF CCJV RECOMMENDATIONS
SEPTEMBER 10, 2013 STATUS REPORT**

CCJV CATEGORY	IMPLEMENTED (I)	PARTIAL (P)	IN PROGRESS (IP)	NOT STARTED (NS)	TOTAL
USE OF FORCE	10	0	2	0	12
MANAGEMENT	12	0	2	0	14
CULTURE	5	3	0	0	8
PERSONNEL AND TRAINING	5	5	0	0	10
DISCIPLINE	10	4	1	0	15
OVERSIGHT	1	0	0	0	1
TOTAL SHERIFF RESPONSIBLE CCJV RECOMMENDATIONS	43	12	5	0	60

DEFINITIONS

IMPLEMENTED (I)

The Department's implementation has been reviewed and approved by the Monitor, and reforms have been incorporated into operations.

PARTIAL (P)

The Department has implemented the recommendation, but some additional steps are required to complete the implementation.

IN PROGRESS (IP)

The Department is assessing policy, procedural, and operational needs and/or is in process of implementing recommendation.

NOT STARTED (NS)

The Department has not initiated, or just started the development of, an implementation plan.

Appendix 2

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.		RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report	10th Report
USE OF FORCE	3.1	Comprehensive and easy-to-understand Use of Force policy in single manual	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	3.2	LASD personnel should be required to read and understand the new UOF policy	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	3.3	LASD personnel should receive training on the new UOF policy	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	3.4	The Use of Force policy should reflect Force Prevention and anti-retaliation policies	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	3.5	The Use of Force policy should be based upon objectively reasonable standard	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	3.6	The Use of Force policy should reflect preference for planned, supervised, and directed force	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	3.7	The Use of Force policy should account for special needs populations	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	3.8	LASD should have a single, reliable and comprehensive data tracking system	Not started	NC	NC	In progress	NC	NC	NC	NC	NC
	3.9	Inmate grievances should be tracked in PPI by names of LASD personnel	In progress	NC	NC	NC	NC	NC	NC	NC	Implemented
	3.10	LASD should analyze inmate grievances regarding use of force incidents	Partial	NC	NC	NC	NC	NC	NC	NC	Implemented
	3.11	Use of force statistical data must be tracked and analyzed in real time by management	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	3.12	LASD should purchase additional body scanners	In progress	NC	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.		RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report	10th Report
MANAGEMENT	4.1	Personal engagement by Sheriff in oversight of jails	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.2	High level managers must be accountable for failing to address use of force problems	In progress	NC	NC	NC	NC	NC	NC	Implemented	NC
	4.3	The Undersheriff should not have any responsibility for custody or discipline	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.4	LASD should create a new Assistant Sheriff position for Custody	In progress	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.5	The Sheriff should appoint a new Custody Assistant Sheriff with corrections experience	In progress	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.6	The Custody Assistant Sheriff should report directly to the Sheriff	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.7	The Commander Management Task Force should not be a part of Custody management	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.8	The Sheriff must monitor the use of force in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.9	LASD should utilize the Sheriff's Critical Incident Forum (SCIF) in Custody	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.10	Senior management must be more visible in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	4.11	Operations support should be allocated based unique needs of each facility	In progress	NC	NC	NC	NC	NC	NC	NC	NC
	4.12	LASD should created an Internal Audit and Inspection Division under a single Chief	In progress	NC	NC	NC	NC	NC	NC	NC	NC
	4.13	LASD should have a policy regarding campaign contributions	In progress	Implemented	NC	NC	NC	NC	NC	NC	NC
	4.14	LASD should participate in the Large Jail Network	Implemented	NC	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report	10th Report
CULTURE	5.1	LASD must emphasize respect for, and communications with, inmates	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	5.2	Force prevention policy should be stressed in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC	NC	NC	NC
	5.3	Ethics training should be enhanced in Academy and Custody Division training	Partial	NC	NC	NC	NC	NC	NC	NC	NC
	5.4	Custody should be a valued and respected assignment and career	In progress	Implemented	NC	NC	NC	NC	NC	NC	NC
	5.5	Senior leaders must be more visible in the jails	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	5.6	LASD must have a zero tolerance policy for acts of dishonesty	In progress	NC	Implemented	NC	NC	NC	NC	NC	NC
	5.7	LASD should have a sensible rotation policy	In progress	Partial	NC	Implemented	NC	NC	NC	NC	NC
	5.8	LASD should discourage participation in cliques	Partial	NC	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

NO.		RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report	10th Report
PERSONNEL AND TRAINING	6.1	LASD should revise its policies to reflect Custody's importance to Department	In progress	Partial	NC	NC	NC	NC	NC	NC	NC
	6.2	LASD should develop and implement a long-range and steady hiring plan	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	6.3	Custody personnel should receive significantly more Custody-specific training	Partial	NC	NC	NC	NC	NC	NC	NC	NC
	6.4	There should be a meaningful probationary period for Custody deputies	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	6.5	LASD should increase the number of Custody supervisors	Not started	NC	NC	In progress	NC	NC	NC	NC	Partial
	6.6	LASD should provide for careers in custody	In progress	Implemented	NC	NC	NC	NC	NC	NC	NC
	6.7	LASD should utilize more custody assistants	In progress	NC	NC	NC	Partial	NC	NC	NC	NC
	6.8	LASD should implement rotations within and among proximate facilities	In progress	Partial	NC	Implemented	NC	NC	NC	NC	NC
	6.9	LASD should change its Mission Statement to reflect importance of Custody	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	6.10	LASD should create a separate Custody Division	In progress	Partial	NC	NC	NC	NC	NC	NC	NC

IMPLEMENTATION OF CCJV RECOMMENDATIONS SUMMARY

	NO.	RECOMMENDATION	2nd Report	3rd Report	4th Report	5th Report	6th Report	7th Report	8th Report	9th Report	10th Report
DISCIPLINE	7.1	The investigative and disciplinary system should be revamped	In progress	NC	NC	NC	NC	NC	NC	NC	Partial
	7.2	The CFRC should monitor force packages	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	7.3	Preclude deputies from reviewing videos before reporting use of force	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	7.4	Separate deputies involved in significant use of force incidents	Partial	NC	NC	NC	NC	Implemented	NC	NC	NC
	7.5	Internal Affairs and ICIB should be enhanced and re-organized under a Chief	In progress	NC	Implemented	NC	NC	NC	NC	NC	NC
	7.6	IAB should be appropriately valued	In progress	Partial	NC	NC	NC	NC	NC	NC	NC
	7.7	There should be enhanced penalties for excessive force and dishonesty	In progress	NC	Implemented	NC	NC	NC	NC	NC	NC
	7.8	There should be a Risk Manager assigned to each custody facility	In progress	NC	NC	NC	NC	NC	NC	NC	Implemented
	7.9	Force investigations should not be conducted by deputies' supervisors	In progress	NC	NC	NC	NC	NC	NC	NC	Partial
	7.10	Use of force and dishonesty charges should not be reduced or held in abeyance	In progress	NC	Partial	NC	NC	NC	NC	Implemented	NC
	7.11	LASD should vigorously investigate and discipline off-duty misconduct	Implemented	NC	NC	NC	NC	NC	NC	NC	NC
	7.12	LASD should have an enhanced system to track force investigations	In progress	NC	NC	Implemented	NC	NC	NC	NC	NC
	7.13	Inmate use of force complaints should be tracked in PPI	In progress	NC	NC	NC	NC	NC	NC	NC	Implemented
	7.14	LASD should improve the inmate grievance process	In progress	NC	NC	NC	Partial	NC	NC	NC	NC
	7.15	Increased use of Lapel Cameras	In progress	NC	NC	NC	NC	NC	NC	NC	NC
OVERSIGHT	8.2	The Sheriff should regularly report to the Board of Supervisors	Implemented	NC	NC	NC	NC	NC	NC	NC	NC

Appendix 3

REMAINING RECOMMENDATIONS

Number	Recommendation	Funding	Status
3.8	Replace PPI and FAST	Yes	Funding approved by Board
3.12	Additional Body Scanners	No	Installation in January 2014
4.11	Allocation of Facilities Operations Resources	Possible	Assessment completed; funding may be requested
4.12	Internal Audit and Inspections Division	Yes	Funding approved by Board for Inspectional Services Command
5.2	Force Prevention Policy training	Yes	See 6.3
5.3	Enhanced Ethics training	Yes	See 6.3
5.8	Discourage Cliques	Yes	See 6.3
6.1	Enhance status of Custody	Yes	See 6.3
6.3	Enhance Custody Division Training	Yes	Funding approved by Board for Custody Training Bureau
6.5	Additional Supervisors	Yes	Funding approved by Board
6.7	Utilize more Custody Assistants	No	Assessment completed; Meet and confer issue
6.10	Separate Custody Division	No	Long-term objective
7.1	Revamp Investigative and Disciplinary System	Yes	Funding approved by Board
7.6	Enhance IAB/ICIB resources	Yes	See 7.1
7.9	Force investigations by Compliance Lieutenant and IAB	Yes	See 7.1
7.14	Enhance Inmate Grievance process	Possible	Coordinator appointed; pilot electronic program in development
7.15	Additional use of lapel cameras	Yes	Proposal for additional fixed CCTV cameras in lieu of initial lapel camera deployment